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ORANGE COUNTY

LOS ANGELES

SAN FRANCISCO

SACRAMENTO

FRESNO

September 20, 2019

Ms. Iana Zadneprovskaia Farber & Company 333 Hegenberger Road, Suite 504 Oakland, CA 94621

Re: Jonathan Shockley v. Biotelemetry, Inc. dba Cardionet, LLC

WCAB No: ADJ12031731 Claim No: 040519008736

Dear Ms. Zadneprovskaia:

As you know, you obtained a replacement PQME list panel number 2458351 dated September 11, 2019.

At this time, please allow defendants to confirm their strike of **Dr. Albert Retodo**, MD. That strike was made by email to Zachary Kweller of your office on September 18, 2019 however as noted in that email I am confirming it as noted within this letter. You struck Dr. Stuart Rubin.

That leaves the parties with Dr. Arzhang Zereshki and your office will set that examination.

Please also proceed to set the examination and then serve my office with notice given us a reasonable amount of time to draft a reasonable advocacy letter. If we do not receive notice that gives defendants a reasonable amount of time to draft our advocacy letter, I will object to the exam moving forward.

Thank you for your attention in this matter.

Kindest Regards,

COLANTONI, COLLINS, MARREN, PHILLIPS & TULK, LLP

BY:

JAMES S. GOINES

JJG/tg

Re: Jonathan Shockley v. Biotelemetry, Inc. dba Cardionet, LLC September 20, 2019

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Mr. Mario Castro (via email) CC:

Chubb Group of Insurance Companies

PO Box 42065 Phoenix, AZ 85080

wcclaimsw2@chubb.com (via email)



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September 20, 2019

Dr. Arzhang Zereshki, MD 1335 Stanford Avenue Emeryville, California 94608

Re:

Jonathan Shockley v. Biotelemetry, Inc. dba Cardionet, LLC

WCAB No:

ADJ12031731

Claim No:

040519008736

Dear Dr. Zereshki:

Please note the parties obtained a replacement PQME list dated September 11, 2019 with panel number 2458351, and the parties went through the strike process. You are the remaining physician.

Applicant's attorney will contact you to set that examination. Please note that if defendants do not receive notice within an adequate amount of time to draft our advocacy letter, we will object to the exam moving forward, because both parties should be allowed a reasonable amount of time to draft those advocacy letters and then serve the same on the other parties.

Thank you kindly for your attention to this matter Dr. Zereshki, and the parties look forward to your reporting.

Kindest Regards,

COLANTONI, COLLINS, MARREN, PHILLIPS & TULK, LLP

BY:

IAMES COUNTS

JJG/tg

Re: Jonathan Shockley v. Biotelemetry, Inc. dba Cardionet, LLC

September 20, 2019

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cc: Ms. Iana Zadneprovskaia

Farber & Company

333 Hegenberger Road, Suite 504

Oakland, CA 94621

Mr. Mario Castro (via email) Chubb Group of Insurance Companies PO Box 42065

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